



HON. SYLVIA O. HINDS-RADIX  
Corporation Counsel

THE CITY OF NEW YORK  
**LAW**  
**DEPARTMENT**  
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December 20, 2023

**VIA ECF**

Hon. Edgardo Ramos  
Thurgood Marshall Courthouse  
40 Foley Square  
New York, NY 10007

**MEMO ENDORSED**

Re: *Z.H. v. N.Y.C. Dep't of Education*, 23-cv-3081 (ER)(OTW)

Dear Judge Ramos:

I am a Special Assistant Corporation Counsel in the Office of Corporation Counsel, the Honorable Sylvia O. Hinds-Radix, attorney for Defendant in the above-referenced action, wherein Plaintiff seeks attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. § 1400, *et seq.*, as well as for this action.

I write to respectfully request that the initial conference, currently scheduled for January 5, 2024, be adjourned *sine die*, or, in the alternative, adjourned to a time thereafter more convenient for the Court, as Defendant has another initial conference scheduled at that same time in a different matter. Plaintiff consents to both these requests. This is the first request to adjourn the initial conference. Defendant issued a written offer on Oct 3, 2023 and has fully valued the case; accordingly, Defendant will not be able to obtain additional settlement authority.

Accordingly, Defendant respectfully requests request that the initial conference, currently scheduled for January 5, 2024, be adjourned *sine die*, or, in the alternative, adjourned to a time thereafter more convenient for the Court. Thank you for considering these requests.

Respectfully submitted,

/s/

Martha Nimmer, Esq.  
Special Assistant Corporation Counsel

cc: Kevin Mendillo, Esq. (via ECF)

The initial conference is rescheduled for  
January 11, 2024 at 10:30 AM.

A handwritten signature in blue ink, appearing to read "Edgardo Ramos".

Edgardo Ramos, U.S.D.J.  
Dated: December 21, 2023  
New York, New York